



Danielle Hamilton &lt;hamilton@loevy.com&gt;

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**Jaimes - Plaintiff's RFP Nos. 9 and 11**

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**Danielle Hamilton** <hamilton@loevy.com>

Tue, Nov 27, 2018 at 5:27 PM

To: "MICHAEL GORMAN (States Attorney)" &lt;MICHAEL.GORMAN@cookcountyil.gov&gt;

Cc: Mike Kanovitz &lt;mike@loevy.com&gt;, Katie Roche &lt;katie@loevy.com&gt;

Michael,

I write regarding two discovery requests from Plaintiff's First Set of RFPs. First, Request No. 9 asks for any insurance policies, contracts, or indemnification agreements that could or might provide coverage to any of the Defendants for any of the allegations in Plaintiff's Complaint. We do not believe we have received any insurance policies--please produce any responsive policies in effect in November 2015. If I am incorrect and these documents have been produced, please point me to them by identifying them by bates number.

Second, Request No. 11 is Erika Aguirre's complete personnel/employee file. It is our understanding from documents that you've produced that Erika took a Cook County Sheriff's Police Department test at least once in September 2015 and again at some other time. It is also understanding that the test and the results would be in her personnel file, but we have not seen them in the file. Please produce any responsive records--or if they are in the file, please point me to them by identifying them by bates number.

Thanks,  
Danielle

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